

BACKUS, CARRANZA & BURDEN
3050 SOUTH DURANGO
LAS VEGAS, NEVADA 89117
TELE: (702) 872-5555 FAX: (702) 872-5545

Plaintiff,

Case No. 2:20-cv-01080-RFB-NJK

Defendants.

Plaintiff BASF Corporation (“BASF”), by the undersigned counsel and with the consent of Defendants Automall Auto Body, LLC KTI LLC, and Fix North LLC (together “Fix Auto”) and Jefferson Bagley (“Bagley”) (collectively “Defendants”), hereby respectfully submits this stipulation to extend the response deadline for Plaintiff to oppose Defendants’ motion for partial summary judgment, making the new response/opposition deadline June 23, 2021.

1. The original response/opposition deadline is Tuesday, June 1, 2021.
2. The parties recently reopened settlement negotiations and are making a good faith attempt to negotiate a resolution.
3. This motion is made in good faith and not for the purposes of undue delay. The opposition deadline has not been extended previously, and the requested extension will allow the parties time to conduct good faith settlement discussions to see if a resolution can be reached without having to burden the Court with motion practice.

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1 WHEREFORE, Plaintiff, with the consent of Defendants, hereby moves and stipulates to
2 extend the response deadlines for Plaintiff's opposition to Defendants' motion for partial summary
3 judgment, making the response/opposition deadline June 23, 2021:

	Old Deadline	New Deadline
Plaintiff's Deadline to Respond to Defendants' Motion for Partial Summary Judgment	June 1, 2021	June 23, 2021
Defendants' Reply Deadline		July 14, 2021

10 **IT IS SO ORDERED**

11
12 
13 **RICHARD E. BOULWARE, II**
14 **United States District Court**

15 DATED this 30th day of May, 2021.

1 Respectfully Submitted This 28th day of May, 2021:

2 WE ASK FOR THIS:

3 JEFFERSON BAGLEY
4 AUTOMALL AUTO BODY, LLC
5 KTI, LLC
6 FIX NORTH, LLC

7 By: /s/ Michael C. Whitticar
8 *Counsel*
9 Michael C. Whitticar (VSB No. 32968)
10 NOVA IP Law, PLLC
11 7420 Heritage Village Plaza, Suite 101
12 Gainesville, VA 20155
13 Tel: 571-386-2980
14 Fax: 855-295-0740
15 E-mail: mikew@novaiplaw.com
16 *Counsel for Defendants*
17 *Admitted Pro Hac Vice*

18 By: /s/ Peter R. Pratt, Esq.
19 *Counsel*
20 Peter Pratt (NSB No. 6458)
21 Law Office of P Sterling Kerr
22 2450 St Rose Pkwy #120
23 Henderson, NV 89074
24 T: (702) 451-2055
25 Email: peter@sterlingkerrlaw.com
26 *Local Counsel for Defendants*

27 SEEN AND AGREED TO:

28 BASF CORPORATION

By: /s/ Edgar Carranza, Esq.
Counsel
Edgar Carranza, Esq.
Nevada State Bar No. 5902
Backus, Carranza & Burden
3050 S. Durango Drive
Las Vegas, NV 89117
(702) 872-5555
(702) 872-5545 facsimile
ecarranza@backuslaw.com
Attorney for Plaintiff BASF Corporation

1 **CERTIFICATE OF CONFERRAL**

2 I hereby certify that I conferred in good faith with Defendant's counsel regarding the
3 foregoing Stipulation for an Extension of Time and Defendant's counsel agreed to the requested.
4 extension.

5 /s/ Edgar Carranza, Esq.
6 Edgar Carranza

7 **CERTIFICATE OF SERVICE**

8
9 I hereby certify that on this 28th day of May, 2021, the foregoing Stipulation to
10 Extend time was served by the following counsel of record by CM/ECF submission which will
11 send a notification to the following counsel of record:

12 Peter Pratt (NSB No. 6458)
13 Law Office of P Sterling Kerr
14 2450 St Rose Pkwy #120
15 Henderson, NV 89074
16 T: (702) 451-2055
17 Email: peter@sterlingkerrlaw.com
18 *Local Counsel for Defendants*

19 Michael C. Whitticar (VSB No. 32968)
20 NOVA IP Law, PLLC
21 7420 Heritage Village Plaza, Suite 101
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23 Tel: 571-386-2980
24 Fax: 855-295-0740
25 E-mail: mikew@novaiplaw.com
26 *Counsel for Defendants*
27 *Admitted Pro Hac Vice*

28 /s/ Patti Sherretts
An employee of Backus, Carranza & Burden

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